



Michael Kamens

Peter Andrews <pandrews@theharmanfirm.com>

Fri, Oct 18, 2013 at 12:19 PM

To: "Windholz, Diane (NYC)" <windhold@jacksonlewis.com>

Cc: "Walker G. Harman, Jr." <wharman@theharmanfirm.com>, Lucas Larson <llarson@theharmanfirm.com>

Hello Diane:

He can be deposed on the 29th - I assume at your offices, can we start at 10 AM as he comes in from Pennsylvania. I am working on confirming that we have a conference room and court reporters for the other two persons, and will send you an e mail later.

With respect to your comments on the production of emails, your approach is not proper. Responsive documents must be produced to us. You cannot simply invite us to your office to review emails. I don't understand why this is a problem. Emails are typically produced in document productions, and you already have produced three of them.



I am certain that this is something you have dealt with in other matters.

Also, Bonni Duchon's refusal to provide us with her cell phone number remains a big problem for us. Again, I don't know why this is a problem, as Mr. Israni and Mr. Ahuja provided their numbers, and Ms. Duchon specifically testified that she uses her phone for business purposes and that her plan is paid for by At Last.

As you know, Mr. Israni's and Mr. Ahuja's disclosures of their cell phone numbers have not resulted in any particular difficulties for them.

We will pursue this matter further.

Peter

Peter Andrews
Attorney at Law
THE HARMAN FIRM, PC
200 West 57th Street | Suite 900 | New York NY 10019
t 212.425.2600 | d 917.826.7478 | f 212.202.3926
pandrews@theharmanfirm.com
www.theharmanfirm.com  

This message and any attached file are intended only for the person or entity to which they are addressed, and may contain information that is privileged, confidential or otherwise protected from disclosure. Dissemination, distribution, or copying of this message or the information herein by anyone other than the intended recipient, or an agent thereof, is prohibited. If you have received this message in error, please notify us immediately.